

DENNIS L. KENNEDY  
Nevada Bar No. 1462  
SARAH E. HARMON  
Nevada Bar No. 8106  
KELLY B. STOUT  
Nevada Bar No. 12105  
AMANDA L. STEVENS  
Nevada Bar No. 13966  
**BAILEY ♦ KENNEDY**  
8984 Spanish Ridge Avenue  
Las Vegas, Nevada 89148-1302  
Telephone: 702.562.8820  
Facsimile: 702.562.8821  
DKennedy@BaileyKennedy.com  
SHarmon@BaileyKennedy.com  
KStout@BaileyKennedy.com  
AStevens@BaileyKennedy.com

*Attorneys for Plaintiff*  
MICHELLE MCKENNA

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MICHELLE MCKENNA,

Plaintiff,

Case No. 2:14-cv-01773-JAD-CWH

vs.

DAVID Z. CHESNOFF, CHTD. P.C. d/b/a  
CHESNOFF & SCHONFELD; DAVID Z.  
CHESNOFF; and RICHARD A. SCHONFELD,

Defendants.

**STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULE FOR  
DEFENDANTS' MOTION TO COMPEL INDEPENDENT MEDICAL EXAM OF  
PLAINTIFF MICHELLE McKENNA**

**(First Request)**

Pursuant to Local Rule IA 6-1, IA 6-2, 7-1, Plaintiff Michelle McKenna ("Ms. McKenna") and Defendants David Z. Chesnoff, Chtd. P.C. d/b/a Chesnoff & Schonfeld; David Z. Chesnoff; and Richard A. Schonfeld (collectively, "Defendants") hereby stipulate and agree as follows:

1. On July 1, 2016, Defendants filed their Motion to Compel Independent Medical Exam of Plaintiff Michelle McKenna ("Motion") [ ECF No. 53].
2. The current deadline for Ms. McKenna to respond to the Motion is July 18, 2016.

1           3.       For the past six weeks, the Parties have delayed further discovery in order to engage  
2 in informal settlement negotiations. *See* Order to Extd. Discov. (Fourth Req.), May 24, 2016 [ECF  
3 No. 51].

4           4.       Although the Parties have not yet reached a settlement, they have agreed to continue  
5 their ongoing settlement discussions by scheduling a mediation with Hon. Jackie Glass (Ret.) on  
6 July 26, 2016.

7           5.       In order to: (i) avoid incurring potentially unnecessary costs and fees while the  
8 parties attempt to negotiate a settlement; and (ii) allow the Parties time to attend the mediation, and,  
9 if successful, finalize a settlement agreement, the Parties stipulate and agree to extend the briefing  
10 schedule for the Motion as follows:

11       ///

12       ///

13       ///

14       ///

15       ///

16       ///

17       ///

18       ///

19       ///

20       ///

21       ///

22       ///

23       ///

24       ///

25       ///

26       ///

27       ///

28       ///

- 1 A. Ms. McKenna will file a Response to the Motion on or before August 15,  
2 2016; and  
3 B. The Defendants will file a Reply in support of the Motion on or before  
4 August 25, 2016.

5 DATED this 15th day of July, 2016.

DATED this 15th day of July, 2016.

6 By: /s/ Kelly B. Stout

By: /s/ Brian K. Terry

7 DENNIS L. KENNEDY  
8 SARAH E. HARMON  
9 KELLY B. STOUT  
10 AMANDA L. STEVENS  
11 BAILEY ♦ KENNEDY  
12 8984 Spanish Ridge Avenue  
13 Las Vegas, Nevada 89148-1302

BRIAN K. TERRY  
SEAN D. COONEY  
THORNDAL, ARMSTRONG, DELK,  
BALKENBUSH & EISINGER  
1100 East Bridger Avenue  
Las Vegas, Nevada 89101

11 *Attorneys for Plaintiff*  
12 MICHELLE MCKENNA

*Attorneys for Defendants*  
DAVID Z. CHESNOFF, CHTD. P.C. d/b/a  
CHESNOFF & SCHONFELD; DAVID Z.  
CHESNOFF; and RICHARD A. SCHONFELD

14 IT IS SO ORDERED:

15   
16 UNITED STATES MAGISTRATE JUDGE

17 Dated: July 18, 2016

18  
19 Respectfully Submitted by:

20 BAILEY ♦ KENNEDY

21 By: /s/ Kelly B. Stout

22 DENNIS L. KENNEDY  
23 SARAH E. HARMON  
24 KELLY B. STOUT  
25 AMANDA L. STEVENS  
26 8984 Spanish Ridge Avenue  
27 Las Vegas, Nevada 89148-1302

25 *Attorneys for Plaintiff*  
26 MICHELLE MCKENNA

BAILEY ♦ KENNEDY  
8984 SPANISH RIDGE AVENUE  
LAS VEGAS, NEVADA 89148-1302  
702.562.8820